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June 9, 2000

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Mr. David Waddell
Executive Secretary
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, TN 37243-0505

Re: "Welcome Back Program" Tariff Filing of BellSouth Telecommunications,
Inc.
Docket No. 00-00391

Dear David:

Please find enclosed the original and thirteen copies of NEXTLINK of Tennessee, Inc.'s first interrogatories and request for production of documents to BellSouth Telecommunications, Inc. in the above-captioned proceeding.

BOULT, CUMMINGS, CONNERS & BERRY, PLC

By:


Henry Walker

HW/nl
c: Parties
Attachment

POSTED
6-12-00

**BEFORE THE TENNESSEE REGULATORY AUTHORITY
NASHVILLE, TENNESSEE**

IN RE: BellSouth Telecommunications, Inc. Tariff to Introduce the Welcome Back! Win Program

Docket No. 00-00391

**DISCOVERY REQUEST OF NEXTLINK TENNESSEE INC.
TO BELL SOUTH TELECOMMUNICATIONS, INC.**

NEXTLINK Tennessee Inc. ("NEXTLINK") requests that BellSouth Telecommunications, Inc. ("BellSouth"), answer each of the following interrogatories and requests for production. These interrogatories are continuing in nature and Rule 26 of the Tennessee Rules of Civil Procedure requires you to seasonably supplement your responses to these interrogatories.

I. Preliminary Matters and Definitions.

The term "identity" or "identify" as used herein, with respect to any person, means to provide the name, current residence address, current residence telephone number, current business address, current business telephone number, and the occupation or job title of that person; with respect to any other entity, those terms mean to provide the name by which said entity is commonly known, the current address of its principal place of business, and the nature of business currently conducted by that entity; with respect to any document, those terms mean to provide the date of the document, the identity of the author or preparer of the document, the type of document (e.g., letter, memorandum, tape recording, etc.), the substance of the contents of the document, the title (if any) of the document, and the present or last-known location and custodian of the document and any copies thereof.

The term "document," as used herein, means any medium, including computers or other electronic media, upon which intelligence or information can be recorded, stored and/or retrieved, and includes, without limitation, the original and each copy, regardless of origin or location, of any book, record, report, statement, diary, notes, audiotape, videotape, computer disk, computer tape, computer printout, electronic or voice mail message, pamphlet, periodical, letter, memorandum (including memorandum, note or report of a meeting or conversation) or any other written, typed, reported, transcribed, punched, taped, filmed, electronic or graphic matter, however produced or reproduced, which is in your possession, custody or control or which was but is no longer in your possession, custody or control. "Document" shall include all copies of documents by whatever means made, including any non-identical copies (whether different from the original because of handwritten notes, underlining, blind carbon copy, or otherwise) and drafts of documents.

The term "relating to" or "relates to," as used herein, means evidencing, supporting, contradicting, constituting, containing, recording, discussing, summarizing, analyzing, disclosing, referring to in whole or in part, or otherwise pertaining to in any way.

For purposes of framing your responses to these interrogatories, the singular should be read to include the plural and vice versa.

With respect to each of the following interrogatories, in addition to supplying the information requested, please identify any and all documents that support, refer to, or evidence the subject matter of each interrogatory in your answers thereto. If any or all of the documents identified herein are no longer in your possession, custody or control because of destruction, loss, or other reason, then you are requested to identify each such document fully, including the nature

and type of the document, its date, the identity of the person who prepared the document, and the identity of the person or entity for whom it was prepared, and to the extent possible, you are requested to summarize the contents of the document and state the manner and date of the disposition thereof. If any of the requested documents are objected to or not produced on the basis of privilege, please include in your response to production, for each document, a written statement evidencing:

- a. The nature and type of the document;
- b. The date;
- c. The author of the document;
- d. The recipient;
- e. The sender; and
- f. A brief description of the contents sufficient to allow the TRA to rule on a motion to compel.

Consistent with the preceding definitions and preliminary matters, answer under oath the following specific interrogatories:

II. Interrogatories

1. Identify all BellSouth employees involved in the development of the Win Back tariff (TRA docket 00-00391) and describe the role of each.

Response:

2. Provide copies of all documents concerning the development of the Win Back tariff.

Response:

3. Provide a chronological, narrative description of how the Win Back tariff was developed and the reasons for it.

Response:

4. Has BellSouth proposed the Win Back tariff in other states? If not, why not?

Response:

5. Estimate the anticipated annual revenue impact of the Win Back tariff and provide supporting workpapers for that estimate.

Response:

6. Is BellSouth willing to offer the same terms provided in the Win Back tariff to all similarly situated customers located in a designated geographic area (such as a rate group or wire center) whether or not those customers presently receive service from a competitive local exchange carrier? If not, why not?

Response:

7. Explain how BellSouth determined the size of the discounts offered in the Win Back tariff.

Response:

8. Explain how BellSouth determined the termination provisions in the Win Back tariff.

Response:

9. Are the termination provisions in the Win Back tariff consistent with the termination provisions in the "Proposed Settlement Agreement" between BellSouth and the TRA staff in Docket no, 00-00170? If not, explain any differences.

Response:

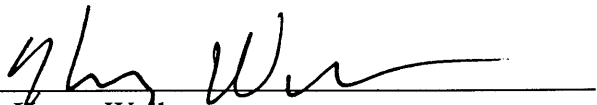
10. Describe all conversations and provide copies of all correspondence with the TRA staff in regard to the Win Back tariff.

Response:

Respectfully submitted,

BOULT, CUMMINGS, CONNERS & BERRY, PLC

By:

A handwritten signature in dark ink, appearing to read "Henry Walker", is written over a horizontal line.

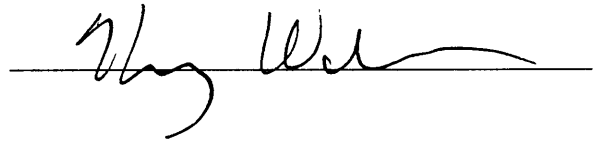
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CERTIFICATE OF SERVICE

I hereby certify that a true and exact copy of the foregoing document has been forwarded via U.S. Mail, postage prepaid, on this 9th day of June, 2000 to:

Patrick Turner, Esq.
BellSouth Communications, Inc.
333 Commerce Street, Suite 2101
Nashville, TN 37201-3300

Charles B. Welch, Jr., Esq.
Farris, Mathews, Branan
& Hellen, PLC
205 Capital
Suite 303
Nashville, TN 37219

A handwritten signature in black ink, appearing to read "Chas Welch", is written over a horizontal line.